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| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10 | Richard M. Heimann (State Bar No. 63607) Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260) Brendan Glackin (State Bar No. 199643) Dean Harvey (State Bar No. 250298) Anne B. Shaver (State Bar No. 255928) LIEFF CABRASER HEIMANN & BERNST 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 Telephone: 415.956.1000 Facsimile: 415.956.1008  Joseph R. Saveri (State Bar No. 130064) Lisa J. Leebove (State Bar No. 186705) James G. Dallal (State Bar No. 277826) JOSEPH SAVERI LAW FIRM 505 Montgomery, Suite 625 San Francisco, CA 94111 Telephone: 415. 500.6800 Facsimile: 415. 500.6803 | ΓΕΙΝ, LLP   |
|---|---|---|
|   | Interim Co-Lead Counsel for Plaintiff Class   |   |
| 12  | [Additional counsel listed on signature page]   |   |
| 13  | LINUTED CTAT  | CEG DISTRICT COLUDT   |
| 14  |   | TES DISTRICT COURT  |
| 15  |   | TRICT OF CALIFORNIA   |
| 16  | SAN JO  | OSE DIVISION  |
| 17<br>18  | IN RE: HIGH-TECH EMPLOYEE<br>ANTITRUST LITIGATION   | MASTER DOCKET NO. 11-CV-2509-LHK STIPULATION AND PROPOSED ORDER                         |
| 19<br>20<br>21                                  | THIS DOCUMENT RELATES TO:  ALL ACTIONS  | PERMITING SUPPLEMENTAL BRIEFING REGARDING PLAINTIFFS' MOTION TO COMPEL GOOGLE DOCUMENTS |
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| 23<br>24  |   |   |
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|   |   | STIPULATION AND PROPOSED ORDER  |

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| 1  | Pursuant to Local Rule 7-12, Plaintiffs and Defendant Google Inc. hereby stipulate and   |   |  |  |
|----|--|---|--|--|
| 2  | 2 agree that:  | agree that:   |  |  |
| 3  | Whereas Plaintiffs deposed Bill Campbell on February 5, 2013, and Plaintiffs consider    |   |  |  |
| 4  | portions of that testimony to be relevant to Plaintiffs' pending motion to compel Google |   |  |  |
| 5  | documents (Dkt. 278);  |   |  |  |
| 6  | Whereas Google has informed Plaintiffs that they have no objection to Plaintiffs making  |   |  |  |
| 7  | an additional submission to the Court as long as Google has an opportunity to respond to |   |  |  |
| 8  | Plaintiffs' submission;  |   |  |  |
| 9  | Therefore, Plaintiffs propose, and Google does not oppose, the following:                |   |  |  |
| 10 | By Wednesday, February 13  | 3, 2013, Plaintiffs may file one additional page of     |  |  |
| 11 | briefing regarding Mr. Cam   | pbell's testimony, and Plaintiffs may attach excerpts   |  |  |
| 12 | from that testimony; and   |   |  |  |
| 13 | By Monday, February 18, 2  | 013, Google may file one additional page of briefing in |  |  |
| 14 | response, and Google may attach additional excerpts of testimony.                        |   |  |  |
| 15 | IT IS HEREBY STIPULATED:   |   |  |  |
| 16 | Dated: February 8, 2013 LIEF   | F, CABRASER, HEIMANN & BERNSTEIN, LLP                   |  |  |
| 17 |  | /s/ Dean M. Harvey                                      |  |  |
| 18 | 8  | Dean M. Harvey  |  |  |
| 19 | 9 Interi   | m Co-Lead Counsel for Plaintiff Class                   |  |  |
| 20 | Dated: February 8, 2013 JOSE   | PH SAVERI LAW FIRM                                      |  |  |
| 21 |  | /s/ Lisa J. Leebove                                     |  |  |
| 22 | 2  | /s/ Lisa J. Leebove<br>Lisa J. Leebove                  |  |  |
| 23 | 3 Interi   | m Co-Lead Counsel for Plaintiff Class                   |  |  |
| 24 | Dated: February 8, 2013 MAY  | TER BROWN LLP   |  |  |
| 25 | <i>Dy</i> . <u>-</u>   | /s/ <i>Lee H. Rubin</i> Lee H. Rubin                    |  |  |
| 26 | Attor  | neys for Defendant Google Inc.                          |  |  |
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| 1                               | Filer's Attestation   |  |  |  |
|---------------------------------|---|--|--|--|
| 2                               | Pursuant to General Order No. 45, § X(B), I attest under penalty of perjury that      |  |  |  |
| 3                               | concurrence in the filing of the document has been obtained from all the signatories. |  |  |  |
| 4                               | Dated: February 8, 2013 /s/ Dean M. Harvey  |  |  |  |
| 5                               | Dean M. Harvey  |  |  |  |
| 6                               | PURSUANT TO STIPULATION, IT IS SO ORDERED.  |  |  |  |
| 7                               |   |  |  |  |
| 8                               | Dated: 2013 By:   |  |  |  |
| 9                               | Honorable Judge Paul Singh Grewal United States District Judge                        |  |  |  |
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